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UBER TECHNOLOGIES, INC.  
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,  
19 Plaintiff,  
20 v.  
21 UBER TECHNOLOGIES, INC.,  
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,  
23 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE  
YANG IN SUPPORT OF  
PLAINTIFF'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
PORTIONS OF ITS OPPOSITION TO  
OTTO TRUCKING'S MOTION TO  
ENFORCE THE COURT'S JUNE 7,  
2017 ORDER (DKT. 987)**

Trial Date: October 10, 2017

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this  
3 declaration based upon matters within my own personal knowledge and if called as a witness, I  
4 could and would competently testify to the matters set forth herein. I make this declaration in  
5 support of Plaintiff's Administrative Motion to File Under Seal Portions of Its Opposition to Otto  
6 Trucking's Motion to Enforce the Court's June 7, 2017 Order (Dkt. 987).

7 2. I have reviewed the following documents and confirmed that only the portions  
8 identified below merit sealing:

Document	Portions to Be Filed Under Seal
Waymo's Opposition to Otto Trucking's Motion to Enforce the Court's June 7, 2017 Order ("Opposition")	Marked portions (in red boxes)

9  
10  
11  
12  
13 3. The marked portions (in red boxes) of Waymo's Opposition contain highly  
14 confidential information regarding the business and financial terms of an ongoing business  
15 agreement. This highly confidential information is not publicly known, and its confidentiality is  
16 strictly maintained. I understand that if this information were to be released to the public,  
17 Defendants' competitors and counterparties would have insight into business and financial terms  
18 offered by Defendants, including terms relating to licensing, which would allow them to tailor  
19 their own negotiation strategy and business offers, such that Uber's competitive standing could be  
20 harmed.

21 4. Defendants' request to seal is narrowly tailored to those portions of Plaintiff's  
22 Opposition that merit sealing.

23 I declare under penalty of perjury under the laws of the United States that the foregoing is  
24 true and correct. Executed this 25th day of July, 2017, at Washington, D.C.

25  
26 /s/ Michelle Yang

Michelle Yang

**ATTESTATION OF E-FILED SIGNATURE**

I, Arturo J. González, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has concurred in this filing.

Dated: July 25, 2017

/s/ Arturo J. González  
Arturo J. González